

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Michael L. Salat

Debtor(s)

PENNYMAC LOAN SERVICES, LLC

Movant

vs.

Michael L. Salat

Debtor(s)

Scott F. Waterman

Trustee

BK NO. 20-11961 JKF

Chapter 13

**PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor PENNYMAC LOAN SERVICES, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 4/1/2020 through 6/1/2020. Creditor holds a secured interest in real property commonly known as 39 North Park Drive Levittown, PA 19054. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 7/1/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to

the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

/s/Rebecca A. Solarz Esquire
Rebecca A. Solarz Esquire
Attorney for Creditor

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CERTIFICATE OF SERVICE

I, Rebecca A. Solarz of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 7, 2020, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Michael L. Salat
39 North Park Drive
Levittown, PA 19054

Attorney for Debtor(s)

Brad J. Sadek, Esq.
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

Trustee

Scott F. Waterman
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Method of Service: electronic means or first class mail

Dated: May 7, 2020

/s/Rebecca A. Solarz Esquire

Rebecca A. Solarz Esquire
Attorney I.D. 315936
KML Law Group, P.C.
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